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MCB CAMP LEJEUNE
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RESPONSE TO NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL
RESOURCES COMMENTS ON DRAFT RECORD OF DECISION FOR OPERABLE UNIT 14
(OU 14) SITE 69 MCB CAMP LEJEUNE NC
3/6/2013
CH2MHILL

**Response to Comments
Draft Record of Decision
Site 69 Operable Unit No. 14
Marine Corps Installations East-Marine Corps Base Camp Lejeune, North Carolina**

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Introduction

The purpose of this document is to address comments on the Draft Record of Decision (ROD) for Site 69 Operable Unit No. 14 located at MCIEAST-MCB CAMLEJ. The North Carolina Department of Natural Resources (NCDENR) provided the comments listed below. The responses to the comments are provided in bold.

NCDENR Comments (Dated February 27, 2013)

General Comments

Dan Hirschman is the new attorney for the Superfund Section. He previously worked as the attorney for the Hazardous Waste Section. Therefore, he is not familiar with CERCLA ARARs. Please address his comments as thoroughly as possible. I think that only comment 4 and 5 below require changes to the ROD. If the ROD is not yet in the signatory process with the EPA, please make these changes in the Final ROD and submit to the EPA for signatures. If the Final ROD is already in the signatory process please reply to these comments in a letter and make sure that these corrections are made in all future RODs and clarify them in your Response to comment letter.

Comment noted and will be addressed by the specific comments below.

Specific Comments

1. What LUCs are already in place at the site? Are they recorded? We need a copy of them.

LUCs currently in place at the site include a Non-Industrial Use Control Boundary, Intrusive Activities Control Boundary (Soil), Intrusive Activities Control Boundary (Groundwater), Aquifer Use Control Boundary (1,000 feet), and an Access Control Boundary, as shown in Figure 2 of the ROD. These LUCs were registered with Onslow County in February 2002 and the State has copies of them and can reference the November 2012 Basewide LUC Summary document that compiles all the current LUCs in place at MCIEAST-MCB CAMLEJ.

2. The ROD states that the existing LUCs "will be updated" (p. 2-18). Will the new LUCs be in addition to the existing ones, how will they be different?

The current LUCs will be replaced with new LUCs, as estimated in Figure 9 of the ROD. The referenced text has been revised to state "will be replaced."

A portion of the existing fence in the southeast corner of the site will be relocated to accommodate the construction of the cap. As a result, the Site 69 boundary will be expanded to include this area. The proposed Intrusive Activities Control Boundary (Soil, Groundwater, and MEC) and Access Control Boundary will follow the new site boundary.

The Non-Industrial Use Control Boundary will be redefined as the Industrial/Non-Industrial Use Control Boundary (Vapor Intrusion) and will encompass the waste disposal area and within 100 feet of surficial and Castle Hayne groundwater COCs exceeding cleanup levels.

The proposed Aquifer Use Control Boundary is the same as the current Aquifer Use Control boundary and is defined by the area within 1,000 feet of groundwater within the surficial and Castle Hayne aquifers with concentrations of COCs exceeding cleanup levels.

The specific LUC boundaries and implementation actions are outlined in the RD (February 2013).

3. What will become of the existing plat map? Will it be replaced, amended, updated? We need to insure compliance with the NC statutory requirements (specifically 143B).

The existing plat map will be replaced and provided to NCDENR for review and signature prior to registration with Onslow County.

4. I believe there may be an inconsistency between the text of the ROD in section 2.6.3 and the ARARs in Appendix A that needs to be resolved. In section 2.6.3 on p. 2-19, the ROD states that "Under NC's groundwater classification, the surficial and Castle Hayne aquifers are considered GA, a potential source of drinking water. NCDENR identified NCGWQS as a 'relevant and appropriate' requirement for groundwater." However, under Appendix A at A-1, under the media heading "classification of contaminated groundwater," the 2L regs are cited and described as "applicable" instead of "relevant and appropriate." I'm inclined to believe the 2L regs are "applicable," but whatever the case, the inconsistency needs to be resolved.

The statement in Section 2.6.3 of the ROD has been revised as follows: "NCDENR identified NCGWQS as "applicable" chemical-specific requirements that are the basis for establishing cleanup levels for groundwater."

5. In section 2.10 "Selected Remedy" of the ROD on p. 2-33 there is a statement that "[...] groundwater modeling predicts that the plume will remain relatively stable and will remain below NCSWQS at the discharge point to the New River." First, does this refer to levels of contaminants within the groundwater plume at the discharge point OR is it levels of contaminants within the surface waters in the New River at the discharge points? Second, is there any actual data from sampling of either groundwater at the discharge point or surface water to show that NC surface water quality standards are not CURRENTLY being exceeded? If there is such data, it should be referenced and a statement should be added to the effect that NCWQS are not currently being exceeded at the discharge point, AND that modeling predicts that that will continue to be the case.

The statement in Section 2.10 refers to levels of contaminants within the groundwater plume at the discharge point to the New River, based on modeling predictions.

In 2005, due to a request by Onslow County Commissioners, NCDENR-Division of Water Quality performed split surface water, sediment, and shellfish sampling with the Base in waters adjacent to Site 69. Based on these results, NCDENR recommended no further sampling and no advisory be issued.

The referenced statement as been revised as follows: "Surface water samples collected adjacent to Site 69 indicated that NCSWQS are not currently being exceeded and modeling predicts that the groundwater plume will remain relatively stable and will remain below NCSWQS at the discharge point to the New River."